

March 5, 2022

Department of the Interior  
Department of Agriculture  
Department of Commerce  
National Ocean and Atmospheric Administration  
White House's Council on Environmental Quality

Re: Docket ID DOI-2021-0016, American Conservation and Stewardship Atlas

To Whom It May Concern:

The Missouri River Conservation Districts Council (MRCDC) is a coalition of the fifteen conservation districts along the Missouri River in Montana. Spanning 725 miles of River corridor from its headwaters in Gallatin County to Richland County at the North Dakota border, MRCDC seeks to be the united voice for conservation of the Missouri River, its tributaries, and its associated uplands. Montana is the first state in the entire 10-state Missouri River basin to organize and fund a grassroots entity focused solely on the Missouri River basin.

With over 58 million acres of land in farms and ranches in Montana, which is 62% of our total land area <sup>(a)</sup>, the America the Beautiful has the potential to have a large effect on Montana and its people. In moving forward with the America Conservation and Stewardship Atlas, we believe the following items need to be considered.

**1. List of definitions for the Atlas.**

With such broad audiences and entity interest in the Atlas, it will be important to define key terms used within the Atlas. A few of the key terms that need defined are conservation, preservation, and restoration. All three of these practices have a place in meeting the America the Beautiful 30x30 goal but need defined so everyone has the same understanding of each.

The following are Merriam-Webster's dictionary definitions <sup>(b)</sup> for those three terms followed by MRCDC's thoughts on each definition:

**Conservation (noun)**

- 1: a careful preservation and protection of something  
*especially* : planned management of a natural resource to prevent exploitation, destruction, or neglect water conservation wildlife conservation

2: the preservation of a physical quantity during transformations or reactions

MRCDC believes that keeping working lands working, such as with farms and ranches, with a *conservation* approach increases carbon sequestration and helps maintain healthier ecosystems when managed properly.

**Preservation (noun)**

the act, process, or result of preserving something: such as

- a: the activity or process of keeping something valued alive, intact, or free from damage or decay
- b: the preparation of food for future use (as by canning, pickling, or freezing) to prevent spoilage

MRCDC believes the definition of *preservation* often does not allow for the capacity of working lands. Rather it tries to keep ecosystems as is, without human interference. This could be devastating to the people of the United States because of the decline in agriculture use on federal lands to provide food, fuel, and fiber needed to survive. Working with local people along with collaborating with the local government on any land being entered into perpetual preservation is important.

**Restoration (noun)**

1: an act of restoring or the condition of being restored: such as

- a: a bringing back to a former position or condition : REINSTATEMENT
- b: RESTITUTION
- c: a restoring to an unimpaired or improved condition
- d: the replacing of missing teeth or crowns

2: something that is restored

*especially* : a representation or reconstruction of the original form

- a: the reestablishing of the monarchy in England in 1660 under Charles II
- b: the period in English history usually held to coincide with the reign of Charles II but sometimes to extend through the reign of James II

MRCDC believes restoration projects work to better the condition of an ecosystem. There have been damages occur to ecosystems in our past, so fixing these problems is an important part of meeting the 30x30 goal.

**2. *Past conservation efforts need included.***

For decades, private landowners, including farmers and ranchers, have been implementing conservation practices on their lands – if they do not take care of their land, it cannot take care of them. These past conservation, preservation, and restoration efforts need to be included in calculating the 30x30 goal and shared on the Atlas in a way that protects private landowner rights.

**3. *Local conservation district efforts.***

As a result of the Great Depression and the Dust Bowl the Natural Resource Conservation Service (NRCS) was established in 1932 by Congress. This was followed by Congress

establishing conservation districts in 1935. Congress recognized the importance of locally led conservation for greater conservation success to occur. Today, there are nearly 3,000 conservation districts across the United States that strive for locally led, grassroots conservation efforts that help promote conservative practices of our soil and water. The historical, 85 plus years of conservation, preservation, and restoration efforts, as well as future efforts that conservation districts partake in should be a huge part of meeting the 30x30 goal and need to be included in the calculation of Conserved acres in the Atlas.

**4. *Federal lands are already conserved lands.***

It is important to keep in mind that these lands are already being conserved in some manner and should all be included in the calculation of Conserved acres in the 30x30 goal in the Atlas.

The Missouri River Conservation Districts Council thanks you for taking our comments into consideration when developing the American Conservation and Stewardship Atlas.

Sincerely,



Laura Kiehl, Chairman  
Missouri River Conservation Districts Council

cc:

Senator John Tester  
Senator Steve Daines  
Representative Matt Rosendale  
Governor Greg Gianforte

- a) Montana Annual Bulletin, 2021. USDA, National Agricultural Statistics Service.
- b) Merriam-Webster.com/dictionary. Retrieved on February 25, 2022.